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— V. —

Defendant.

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S19 17 Cr. 89 (CS)

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1. From at least in or about 2000, up to and including at least in or about May 2017, in the Southern District of New York and elsewhere, STEVEN D. CREA, a/k/a "Stevie Jr.," the defendant, and others known and unknown, being persons employed by and associated with La Cosa Nostra, an "enterprise," as that term is defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to violate 18 U.S.C. § 1962(c), to wit, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Sections

1961(1) and 1961(5) of Title 18, United States Code, consisting of multiple acts involving:

- a. Murder, in violation of New York Penal Law Sections 20.00, 105.15, 110.00, 125.25, and 125.27;
- b. Extortion, in violation of New York State Penal Law, Sections 110.00, 105.10, 155.40;
- c. Gambling, in violation of New York State Penal Law, Sections 225.00 and 225.10;

and multiple acts indictable under the following provisions of federal law:

- d. Title 18, United States Code, Section 1951 (Hobbs Act extortion); and
- e. Title 18, United States Code, Section 1955 (relating to the management of an illegal gambling business).

2. It was a part and object of the conspiracy that STEVEN D. CREA, a/k/a "Stevie Jr.," the defendant, agreed that either he or a co-conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Act

3. In furtherance of the conspiracy and to effect the illegal objects thereof, in or about 2005, STEVEN D. CREA, a/k/a "Stevie Jr.," the defendant, directed other members of the conspiracy to confront members of the Bloods street gang over control of illegal gambling machines in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

4. In or about late 2012, in the Southern District of New York and elsewhere, STEVEN D. CREA, a/k/a "Stevie Jr.," the defendant, and others known and unknown, knowingly and willfully did conspire and agree together and with each other to violate Title 18, United States Code, Section 1959(a)(1).

Overt Act

5. In furtherance of the conspiracy and to effect the illegal objects thereof, STEVEN D. CREA, a/k/a "Stevie Jr.," the defendant, directed other members of the conspiracy to murder an individual ("Victim-1") in the Bronx, New York.

(Title 18, United States Code, Section 371.)

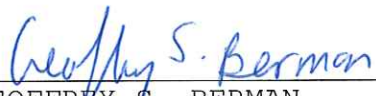
COUNT THREE

The United States Attorney further charges:

6. In or about late 2012, in the Southern District of New York and elsewhere, STEVEN D. CREA, a/k/a "Stevie Jr.," the defendant, and others known and unknown, for the purpose of gaining entrance to and maintaining and increasing position in La Cosa Nostra, an enterprise engaged in racketeering activity, as described above, knowingly attempted to commit, and aided and abetted the attempt to commit, assault with a dangerous weapon,

in violation of New York Penal Law, Sections 120.05 and 110.00.

(Title 18, United States Code, Sections 1959(a)(6) and 2.)



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

STEVEN D. CREA,

Defendant.

INFORMATION

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(18 U.S.C. §§ 371, 1959(a)(6), and 2)

GEOFFREY S. BERMAN
United States Attorney.
